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FILED
RICHARD W. NAGEL
CLERK OF COURT

2022 SEP 22 PM 1:32

JANE DOE

Plaintiff

CASE NUM. 2:22 - C-8156
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

VS

Judge: Edmund SARGOS JR

MAG.: Judge Tolson

Robert Bellar

Defendant

Answer of Defendant

Robert Bellar

Now comes Defendant (Robert Bellar) hereinafter ("defendant") for his answer to the complaint states as follows

1) Responding to Paragraphs [#]6 & 7 of Plaintiff's complaint, Defendant admits that James Bellar is the brother of Defendant and the minister of Dove Outreach Church, but denies due to lack of knowledge that James Bellar is the owner/operator of Dove Outreach Church, and that the church is headquartered at 251 Beaver Pike.

2) Defendant admits that Deborah Bellar and himself are the Plaintiff's biological parents, but denies the rest of Paragraph [#]11 especially the reference of "Dove Outreach Church being 'cult like' and the preaching of its doctrine

- 3) Responding to paragraph #19 that the Defendant has been a "close friend" and has known Jimmy Childs for "many years" this Defendant denies, for out of Defendants 31 years of marriage Jimmy Childs has been a professional acquaintance for a few years.
- 4) Responding to paragraphs #1, 4 & 5 of Plaintiffs complaint, Defendant admits to the facts in the paragraphs at the time of the complaint.
- 5) Responding to paragraphs #12, 13, 14, 16, 20, 21, 22, 24, 25, 28, 46, 47, 48, 49, 50, 51, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 93, 94, ⁹⁵97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138 of the Plaintiffs complaint, the Defendant denies the allegations in the paragraphs, but does also deny any paragraph due to a lack of knowledge not being able to affirm any reference to "admonishment" rights, "O.R.C." and "U.S.C." statutes.

6) Responding to paragraphs [#] 2, 3, 8, 9, 10, 15, 17, 18, 23, 26, 27, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 52, 53, 54, 55, 56, 57, 58, 59, 60, 85, 86, 87, 88, 89, 90, 91, 92, 95, 96 of the Plaintiffs Complaint, Defendant denies the allegation due to a lack of knowledge.

Affirmative Defenses

- 1) The complaint fails to state a claim upon which relief can be granted
- 2) The injuries and damages alleged in the Complaint were not the proximate and/or direct result of any action or inaction of answering Defendant and therefore, Plaintiffs recovery against Defendant is barred.
- 3) Plaintiff has failed to mitigate any alleged damages
- 4) Defendant raises each and every other affirmative defense applicable under Ohio's new tort reform, as some may be declared applicable in this instance

5) Defendant reserves the right to later assert affirmative defenses that become apparent by further discovery.

6) The Defendant prays that the Complaint be dismissed with prejudice, that Defendant be granted judgement, and for costs expended herein.

7) The Defendant prays the court that if #6 herein the "Affirmatives Defenses" is not possible, that this proceeding be postponed until the Defendant is released from incarceration so as to ~~per~~ properly prepare a defense of this Complaint. Please Consider

A) the Defendant has no access to legal definitions readily available for a timely response.

B) The defendant is limited to the amounts of envelopes, paper needed to reply to Complaint.

C) The Defendant is limited to 10 pages of paper per envelope, I would have desired to answer some of these paragraphs of the Complaint, but response times and supplies would have been a limitation, to answer them further or in more detail.

D) It was 6 months before I, the Defendant, was served with the Plaintiffs Complaint.

E) The Defendant also cannot communicate with the other Defendants if found pertinent.

Notification Request

D) Defendant prays the court that all parties be served with copies of the Defendants answer

Respectfully Submitted,
Robert Bellar
Robert Bellar A797993
15708 McConnellville Rd
Caldwell OH 43724